

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
TRI-STATE PAPER, INC.	:	Chapter 11
Debtor	:	Case No. 23-13237-pmm
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**PENN JERSEY PAPER CO.’S MOTION FOR EXPEDITED HEARING ON  
MOTION FOR RECONSIDERATION OF THE COURT’S DENIAL  
OF PENN JERSEY PAPER CO.’S MOTION TO HAVE PROOF OF CLAIM  
FILED OUT OF TIME DEEMED TIMELY FILED PURSUANT TO F.R.B.P. 9006(b)(1)**

AND NOW COMES Penn Jersey Paper Co. (“Penn Jersey”), by and through its undersigned counsel, Joshua B. Ladov, Esquire, and Ladov Law Firm, P.C., filing this Motion for Expedited Hearing on Motion for Reconsideration of the Court’s Denial of Penn Jersey Paper Co.’s Motion to Have Proof of Claim Filed Out of Time Deemed Timely Filed Pursuant to F.R.B.P. 9006(b)(1) (the “Motion”) as follows:

1. On March 21, 2024, Penn Jersey filed a Motion for Reconsideration of this Honorable Court’s Denial of Penn Jersey Paper Co.’s Motion to Have Proof of Claim Filed Out of Time Deemed Timely Filed Pursuant to F.R.B.P. 9006(b)(1) (the “Substantive Motion”).
2. The ordinary course hearing date for the Substantive Motion was Wednesday, April 24, 2024 at 9:30 a.m., and a Notice of Motion for that date was filed.
3. Penn Jersey respectfully requests that the Substantive Motion be heard on an expedited basis on Wednesday, March 27th at 9:30 a.m. in Courtroom 1 for the following reasons:
  - a. Debtor’s Ch. 11 Plan Confirmation Hearing and the objections thereto (including PJP’s objection) will be heard at that time;

- b. Judicial economy and Plan administration would best be served by hearing all matters at the same time;
  - c. As scheduled, the Motion for Reconsideration would not be heard for over a month after the scheduled Confirmation Hearing, i.e. on April 27th.
4. Penn Jersey complied with L.B.R. 5070-1(g)(1) by seeking approval for an expedited hearing from Debtor's Counsel, Michael L. Assad, Esquire, Subchapter V Trustee Richard E. Furtek, Esquire, and the United States Trustee, and all agreed to Penn Jersey's request for an expedited hearing on Wednesday, March 27th at 9:30 a.m.
5. Because granting or denying the substantive motion does not have the potential to prejudice any parties other than the Debtor, the Court should not require Penn Jersey to serve the order scheduling an expedited hearing on the master creditor list.

**WHEREFORE**, Penn Jersey Paper Co. respectfully requests that this Honorable Court to grant relief in the form of order attached and further in its favor, if necessary and proper under the law.

**LADOV LAW FIRM, P.C.**

/s/ Joshua B. Ladov  
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Dated: March 22, 2024